

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

TANAIRY JASSO,)
)
Plaintiff,)
)
vs.)
)
VILLAGE OF PALATINE,)
a municipal corporation,)
TOWNSHIP HIGH SCHOOL)
DISTRICT 211, a municipal corporation,)
OFFICER J. MURPHY, Star 181,)
a Palatine and/or Township High School)
District 211 police officer,)
)
)
Defendants.)

COMPLAINT

Jurisdiction/Venue

1. This incident occurred on about October 16, 2012, in the Village of Palatine, Cook County, Illinois.
2. The Plaintiff, Tanairy Jasso, was born in December of 1995, and thus she was 16 years old at the time of this incident.
3. The Plaintiff turned 18 years old in December of 2013.
4. The jurisdiction of this Court is invoked pursuant to the Civil Rights Act, 42 U.S.C. § 1983, § 1988, the judicial code 28 U.S.C. § 1331 and § 1343(a); the Constitution of the United States, and pendent jurisdiction, as provided under U.S.C. § 1367(a).

Parties

5. At all relevant times pertaining to this occurrence, Plaintiff Tanairy Jasso was residing in Palatine, Cook County, Illinois.
6. At all relevant times pertinent to this occurrence Defendant J. Murphy (Star 181) was

a sworn Village of Palatine police officer acting within the course and scope of his employment and/or agency with the Village of Palatine and/or Township High School District 211.

Facts

7. On or about October 16, 2012, Plaintiff Tanairy Jasso, a student at Palatine High School, a school operated and/or managed by Township High School District 211, in the Village of Palatine, was tackled to the concrete parking lot ground by Defendant Officer Murphy, a Palatine police officer assigned to work for and/or at Palatine High School.
8. Officer Murphy had no lawful justification for tackling the Plaintiff onto the hard concrete and/or tackling the Plaintiff in such an unreasonable and excessive manner.
9. Officer Murphy acted unreasonably, intentionally, recklessly and/or willfully and wantonly.
10. As a result of this battery and excessive use of force, the Plaintiff suffered severe damages, including but not limited to lacerations, abrasions, and concussive symptoms, which required hospitalization.
11. As a result of the incident, the Plaintiff also suffered pecuniary damages (medical bills) and severe emotional distress.
12. The Plaintiff brings a state law battery claim against the Village of Palatine and Township School District 211.
13. The Plaintiff brings a federal claim of excessive force against Officer J. Murphy (Star 181).
14. The Plaintiff brings an indemnification claim against the Village of Palatine and

Township School District 211 for the federal claim against Defendant Murphy.

15. The Plaintiff seeks compensatory damages against all Defendants, and punitive damages against Officer J. Murphy (Star 181).

PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully submitted,

By: s/ Richard Dvorak

Richard Dvorak,
The Plaintiff's Attorney.

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